

Exhibit #1

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JAN 20 2017

Office of Land Survey &
Remonumentation

AFFIDAVIT OF ERIN LAMB

NOW COMES your affiant, Erin Lamb, and hereby deposes and states on her own personal knowledge as follows:

1. I, Erin Lamb, am employed as a Cartographer in the Land Resource Division in St. Joseph County, Michigan and I have worked in this capacity for the past 13 years.
2. A Cartographer someone who has the required education and/or training and is involved with the scientific, technological and artistic aspects of developing and producing maps.
3. Douglas Kuhlman, Lockport Township's Zoning Administrator, asked me to research and develop several technical maps regarding certain parcels located in the City of Three Rivers and Lockport Township, St. Joseph County.
4. The purpose of this request was to determine the municipal boundary lines between the City of Three Rivers and Lockport Township, and which municipality certain parcels were located in.
5. In my capacity as a Cartographer in the Land Resource Division for the County of St. Joseph, I have advanced training in and access to parcel indentifying information and possess the ability and technological expertise to develop and produce maps, and distinguish municipal boundary lines based on this information.
6. As a Cartographer, I developed and produced several maps and provided the same to Mr. Kuhlman regarding certain parcels located in the City of Three Rivers and Lockport Township.

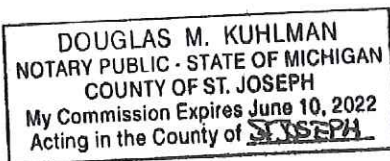
7. The maps I generated and developed accurately depict each parcel's location, accurately reflect the municipal boundary lines between the City of Three Rivers and Lockport Township, and accurately reflect which municipality certain parcels are located in.
8. I affirm that the maps attached to this affidavit were researched, developed and produced were done through my research and technological expertise.
9. I am competent as a witness and can testify as to the truth of these statements if called upon to do so.


Date: 1-10-17


Erin Lamb
Cartographer, Land Resource Division
St. Joseph County

STATE OF MICHIGAN)
)
COUNTY OF ST. JOSEPH)

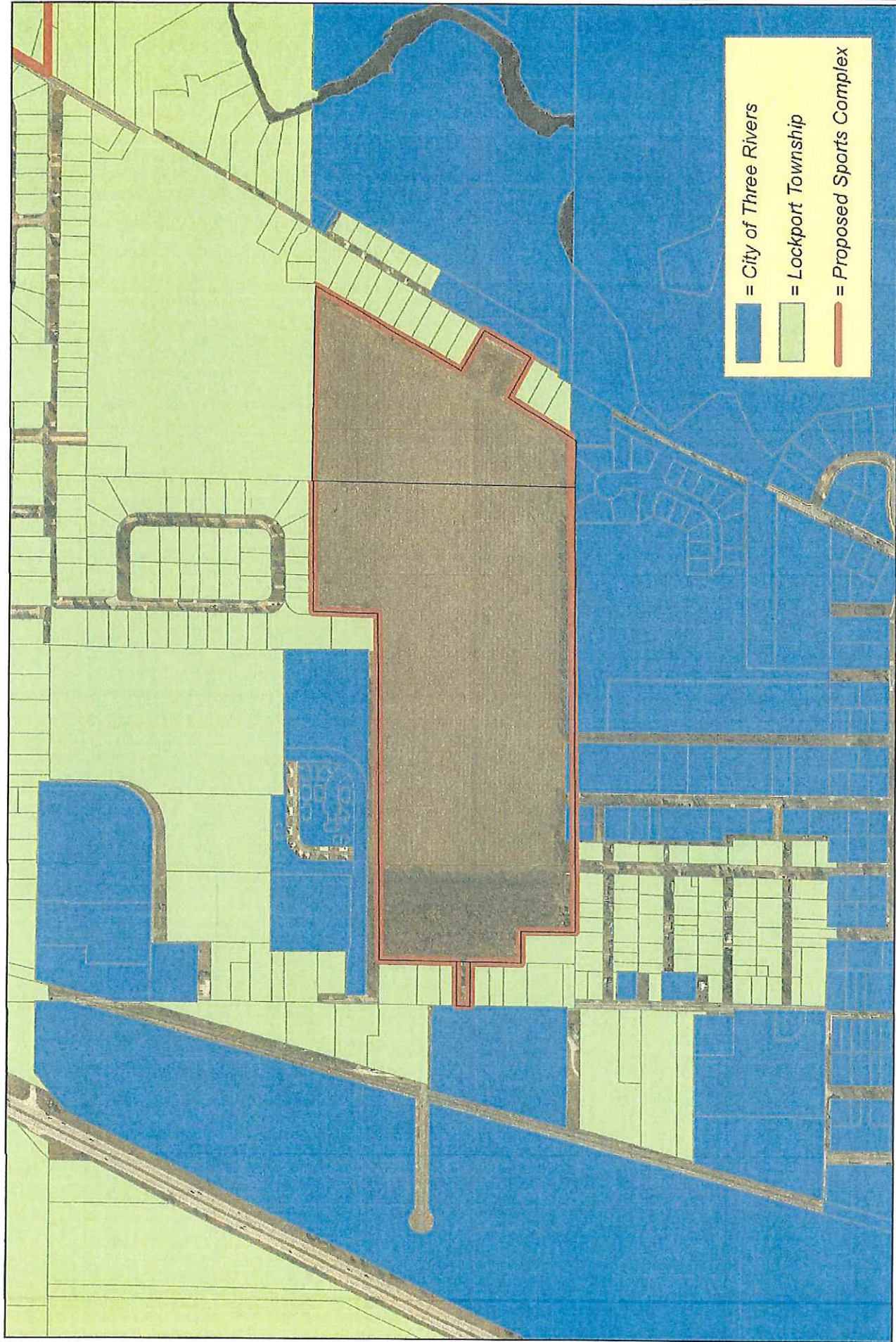
Subscribed to and sworn to before me a notary public for the County of St. Joseph, State of Michigan this 10TH day of JANUARY 2017




_____, Notary Public
County of St. Joseph, State of Michigan
acting in St. Joseph County, Michigan
My commission expires:



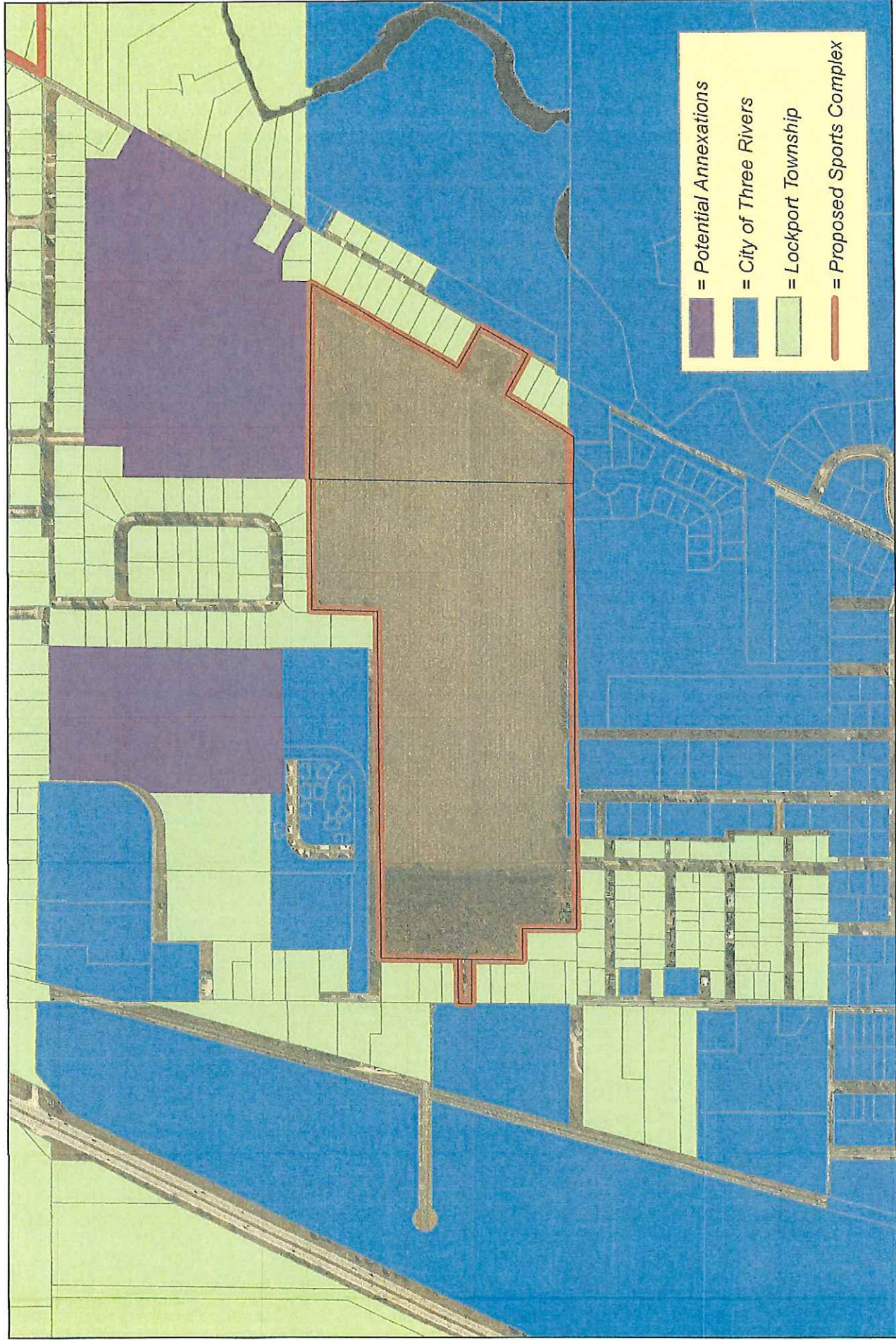
Township Enclave Map



Scale: 1 in = 650 ft

Produced By: St. Joseph County Land Resource Centre (269) 467-5576.
Geographic Information Systems Department
St. Joseph County assumes no responsibility for the property outlines in this map.

Township Enclave Map



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Exhibit #2

In addition the chart below represents a comparison of the overall estimated tax revenue between the years 2015 and 2016 for those units in St. Joseph County. It should be noted that Lockport Township is quite stable with a 0.81% increase in estimated tax revenue whereas the City of Three Rivers is estimated to take a substantial loss of 20.22%. It is difficult to understand the logic or analogy of the City to state that they will construct and maintain a complex of this size and nature when just in one year only they have an estimated 20.22 percent loss in tax revenues.

Comparison of Overall Estimated Tax Revenue

Local Governmental Units	2015 Estimated Tax Dollars	2016 Estimated Tax Dollars	% Change
001 Burr Oak Township	\$57,225	\$59,789	4.48%
002 Colon Township	\$421,611	\$426,010	1.04%
003 Constantine Township	\$174,934	\$155,227	-11.27%
004 Fabius Township	\$0	\$0	0.00%
005 Fawn River Township	\$0	\$0	0.00%
006 Florence Township	\$38,352	\$38,577	0.59%
007 Flowerfield Township	\$45,342	\$55,574	22.57%
008 Leonidas Township	\$108,410	\$111,321	2.69%
009 Lockport Township	\$150,528	\$151,750	0.81%
010 Mendon Township	\$176,651	\$190,949	8.09%
011 Mottville Township	\$55,408	\$49,713	-10.28%
012 Nottawa Township	\$291,057	\$291,540	0.17%
013 Park Township	\$215,192	\$213,948	-0.58%
014 Sherman Township	\$64,229	\$64,995	1.19%
015 Sturgis Township	\$0	\$0	0.00%
016 White Pigeon Township	\$359,573	\$348,947	-2.96%
051 Three Rivers City	\$4,202,096	\$3,352,581	-20.22%
052 Sturgis City	\$3,152,341	\$2,758,834	-12.48%
040 Burr Oak Village	\$127,860	\$129,037	0.92%
041 Colon Village	\$374,680	\$363,900	-2.88%
042 Centreville Village	\$250,526	\$246,314	-1.68%
043 Constantine Village	\$856,808	\$788,062	-8.02%
044 Mendon Village	\$219,625	\$175,259	-20.20%
045 White Pigeon Village	\$271,530	\$280,303	3.23%

Data obtained from the 2016 St. Joseph County Apportionment Report

Exhibit #3

Criteria Questionnaire for Annexation
Docket No. 16-AR-01
Page 50

Additional the following chart points out that the assessed values of Lockport Township parcels have increased 1.50 percent over the last year whereas the assessed values of property in the City of Three Rivers decreased by 20.17 percent. Again attempting to find any logic behind the City of Three Rivers of the River Country Recreation Authority to make such a move is difficult to recognize.

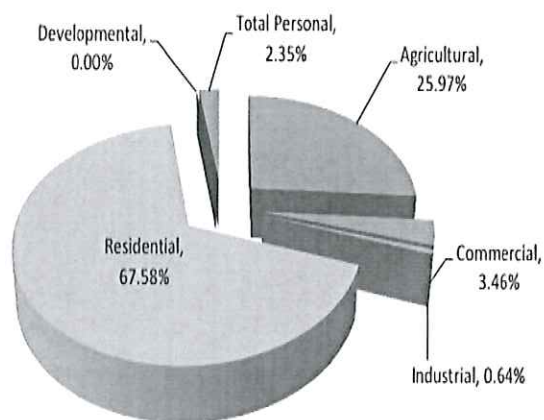
Unit #	Unit Name	Number of Parcels	TOTAL VALUES			2015 Taxable Value	2016 Taxable Value	% Change
			2015 Assessed Value	2016 Assessed Value	% Change			
001	Burr Oak Township	1,622	\$104,699,100	\$112,850,200	7.79%	\$63,774,314	\$66,765,830	4.69%
002	Colon Township	2,680	\$152,879,800	\$158,120,600	3.43%	\$100,753,090	\$102,682,639	1.92%
003	Constantine Township	2,091	\$162,286,400	\$145,904,400	-10.09%	\$121,045,027	\$107,408,850	-11.27%
004	Fabius Township	2,936	\$226,168,750	\$230,072,400	1.73%	\$174,844,389	\$175,548,146	0.40%
005	Fawn River Township	935	\$58,231,500	\$58,295,200	0.11%	\$35,183,605	\$35,416,228	0.66%
006	Florence Township	830	\$89,302,600	\$89,346,900	0.05%	\$41,850,946	\$42,096,535	0.59%
007	Flowerfield Township	1,096	\$100,314,803	\$105,513,485	5.18%	\$51,026,358	\$62,675,330	22.83%
008	Leonidas Township	989	\$82,285,600	\$84,560,200	2.76%	\$41,996,408	\$42,697,392	1.67%
009	Lockport Township	2,282	\$133,688,600	\$141,109,000	5.55%	\$101,066,344	\$102,582,600	1.50%
010	Mendon Township	1,854	\$141,933,400	\$148,857,200	4.88%	\$92,275,731	\$98,032,989	6.24%
011	Mottville Township	985	\$81,650,800	\$75,793,700	-7.17%	\$58,938,671	\$52,880,956	-10.28%
012	Nottawa Township	2,527	\$166,620,100	\$171,235,600	2.77%	\$116,450,663	\$116,643,958	0.17%
013	Park Township	1,804	\$174,779,700	\$179,730,800	2.83%	\$130,080,252	\$129,156,771	-0.71%
014	Sherman Township	2,212	\$169,300,136	\$175,268,100	3.53%	\$128,457,753	\$129,990,861	1.19%
015	Sturgis Township	1,022	\$72,366,100	\$75,438,500	4.25%	\$49,654,154	\$49,020,098	-1.28%
016	White Pigeon Township	2,908	\$234,393,700	\$234,552,300	0.07%	\$193,641,319	\$187,919,107	-2.96%
051	Three Rivers City	3,198	\$230,086,600	\$192,876,100	-16.17%	\$214,729,216	\$171,421,543	-20.17%
052	Sturgis City	4,135	\$258,883,300	\$237,852,700	-8.12%	\$243,386,744	\$212,961,182	-12.50%
St. Joseph County Total		36,106	\$2,639,870,989	\$2,617,377,385	-0.85%	\$1,959,154,984	\$1,885,901,015	-3.74%

Data obtained from the 2016 St. Joseph County Apportionment Report

Exhibit #4

2016

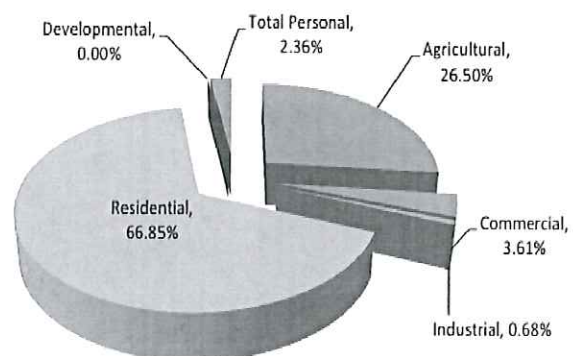
**St. Joseph County
Lockport Township**
Summary of Recommended
County Equalized Values and Trends



Data obtained from the 2016 St. Joseph County Equalization Report

2015

**St. Joseph County
Lockport Township**
Summary of Recommended
County Equalized Values and Trends



Data obtained from the 2015 St. Joseph County Equalization Report

Exhibit #5

1 question, depending on what decision is made, one of the
2 parties may appeal this to the Court of Appeals. I don't
3 take any offense at that. These are complicated issues, and
4 they're emotionally charged issues. People are talking
5 about where they live, their neighbors, the traffic on their
6 street, the ability to provide a sports facility for young
7 people in Three Rivers. And this has, to some extent,
8 divided the community. I think, if you were to take a vote,
9 certainly, I don't know that this would--I don't think it
10 would be approved in a vote of the voters of Lockport
11 Township, and I don't think it would be approved by the
12 voters of the City of Three Rivers. But that doesn't
13 matter. Now, the City Commission is empowered by the voters
14 of the City of Three Rivers to do their legislative
15 business, and as Mr. Mulder pointed out, this is a
16 legislative act, not an administrative act.

17 "With this recreational agreement, the
18 City of Three Rivers agrees to pay for the
19 costs and expenses related to the management
20 and operation of the recreational programs,
21 provided, however, that the City may charge
22 reasonable fees for the use of the
23 recreational facility, and participation and
24 recreational programs."

25 I don't know where that money's going to come from, but

1 that's not a question that's before the Court. I don't know
2 how they settled on a \$755,000.00 price for this parcel of
3 property. That's not a question before the Court. I don't
4 know whether there are other appropriate locations in the
5 City of Three Rivers or somewhere else that would meet this
6 need. And as I said, I'm not sure why they wouldn't use a
7 parcel they already owned, as opposed to having to purchase
8 one. But again, that's not before the Court. Those are
9 policy questions for the boards, and Lockport Township, by
10 their current board, does not want this facility at this
11 location. That doesn't make them bad guys or anti-kid, or
12 anti-City of Three Rivers. They have their legitimate
13 reasons why they don't want this there.

14 The City does want it there. At least the City
15 Commission wants it at that location. And they're not able
16 to get a 425 agreement. They're not able to get a urban
17 cooperation agreement. And it's very unlikely that if they
18 purchased it, which they have, they would get a special use
19 variance to do what they want to do there.

20 So, what's left to them is this option of annexation by
21 resolution, it's been referred to. And there's a specific
22 statute; it's been cited a number of times. It's 117.98(a),
23 I think it is. And they're saying, This statute allows us
24 to do this, whether the people in Lockport Township like it
25 or not, we can do this. Now, whether it was done like a